

# **EXHIBIT B**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**UNITED STATES, *et al.*,**

***Plaintiffs,***

**- against -**

**GOOGLE LLC,**

***Defendant.***

**Civil Action No. 1:23-cv-00108  
(LMB) (JFA)**

**DECLARATION OF ALEXANDER BERGERSEN**

I, Alexander Bergersen, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am currently Competition Counsel at Google LLC (“Google”), located in New York, New York. Among other duties, I oversee the collection of data and other information responsive to regulatory requests for information and discovery requests in litigation involving Google’s display advertising business.

2. In connection with those duties, I have personal knowledge of, among other areas: (i) individuals with knowledge of Google’s accounting practices and procedures; (ii) individuals with knowledge of Google’s product-level financial forecasting and planning; (iii) individuals with knowledge of Google’s advertising products at issue in this action, including, but not limited to, DoubleClick products, Google Ads, AdX, DFP, and AdMeld; (iv) and datasets collected in connection with with this action, including the datasets Plaintiffs list in Topic 8 of the Notice of Deposition served on August 9, 2023 (the “Notice”).

3. Topic 1 of the Notice seeks testimony concerning multiple topics ranging from “means through which AdX submits bids to publishers that do not use DFP” to Google’s accounting

policies and procedures related to products Plaintiffs purport to be within “the DVAA and Core DVAA product groups,” including “AdX, AdSense, AFC, DFP, GAM, GDN, DBM, DBM-Non-Google, Ad Serving, Exchange Bidding, and DV360 and successor and predecessor products and services.” I am unaware of a single Google employee who already knows or could learn all of the topics and subtopics listed in Topic 1 of the Notice for the nine-year time period requested in the Notice by September 8, 2023.

4. Topic 2 of the Notice seeks testimony related to Google’s cost-allocation methodology across “Google product areas such as DVAA, Search, Search Advertising, YouTube and [] Google reporting segments such as Google Services, Google Cloud, and Other Bets.” Topic 2 of the Notice also seeks testimony related to Google’s cost-allocation methodology “within Display Advertising Business Components to products and services, including AdX, AdSense, AFC, DFP, GAM, GDN, DBM, DBM-Non-Google, Ad Serving, Exchange Bidding, and DV360 and successor and predecessor products and services.” I am unaware of a single Google employee who already knows or could learn all of the topics and subtopics listed in Topic 2 of the Notice for the nine-year time period requested in the Notice by September 8, 2023.

5. Topic 5 of the Notice seeks testimony related to financial forecasting and planning related to products Plaintiffs purport to be within “the DVAA and Core DVAA product groups,” including “AdX, AdSense, AFC, DFP, GAM, GDN, DBM, DBM-Non-Google, Ad Serving, Exchange Bidding, and DV360 and successor and predecessor products and services.” I am unaware of a single Google employee who already knows or could learn all of the topics and subtopics listed in Topic 5 of the Notice for the nine-year time period requested in the Notice by September 8, 2023.

6. Topic 8 of the Notice seeks testimony on datasets produced by Google in this action. I am unaware of a single Google employee who already knows or could learn all of the topics and subtopics listed in Topic 8 of the Notice for the nine-year time period requested in the Notice by September 8, 2023.

7. Topic 17 of the Notice seeks testimony regarding the “nature, function, and operation” of Google’s digital advertising products and various innovations, including “DoubleClick products,” AdX, DFP, and AdMeld, Dynamic Allocation, Project Bell, Dynamic Revenue Share, Project Poirot, Project Bernanke, Project Alchemist, Unified Pricing Rules, and Smart Bidding. I am unaware of a single Google employee who already knows or could learn all of the topics and subtopics listed in Topic 17 of the Notice for the nine-year time period requested in the Notice by September 8, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 18, 2023 in New York, New York.

*Alexander Bergersen*

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